

No. PD- 0477 -19

ISSAC WILLIAMS,
Appellant

v.

STATE of TEXAS,
Appellee

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IN THE COURT OF
COURT OF CRIMINAL APPEALS
5/10/2019
DEANA WILLIAMSON, CLERK

CRIMINAL APPEALS

AUSTIN, TEXAS

**STATE'S MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR
DISCRETIONARY REVIEW**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Joe D. Gonzales, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State's petition for discretionary review in the above styled cause.

I. STATEMENT OF THE CASE

Appellant was indicted and convicted of continuously trafficking a minor under Bexar County cause number 2014-CR-8370B. The Fourth Court of Appeals reversed the trial court's judgment on April 10, 2019 under cause number 04-17-00815-CR. The State's petition is due May 10, 2019. This is the State's first request for an extension.

II. REASONS FOR THE REQUEST

The undersigned counsel was recently away from the office attending a CLE and was traveling with his family. The undersigned counsel has also been assisting in the following cases pending trial in Bexar County: *State v. McKane*, No. 2017-CR-1505; and, *State v. Garcia*, No. 2017-CR-11896. Additionally, the undersigned counsel has recently filed briefs and responses in *State v. Lopez*, No. PD-1291-18 (Court of Criminal Appeals, merits brief); *In re A.T.G.*, No. 18-1071 (Supreme Court, response to respondents motion to dismiss Department's petition for review); and, *County v. State*, No. 04-18-00813 (Fourth Court of Appeals, merits brief).

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time for an additional 15 days to file the petition for discretionary review in this case.

Respectfully submitted,

JOE D. GONZALES
Criminal District Attorney
Bexar County Texas

/s/ *Nathan E. Morey*

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Attorneys for the State of Texas

CERTIFICATE OF SERVICE

I, Nathan E. Morey, certify that a copy of the foregoing motion has been emailed to Dayna L. Jones and the Office of the State Prosecuting Attorney on May 10, 2019.

/s/ *Nathan E. Morey*

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